



COMMONWEALTH of VIRGINIA

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ODW Program Guidance During the SARS-CoV-2 (Coronavirus) Pandemic

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To: ODW staff

Document History Log

History	Date	Description
Issued	April 1, 2020	Initial Program Guidance
First Revision	May 1, 2020	Updated monitoring and reporting requirements.
Second Revision	May 15, 2020	Resumption of routine fieldwork.
Third Revision	May 29, 2020	Updated to be consistent with Executive Order 63.
Fourth Revision	June 12, 2020	Added screening recommendations, increased staff at site visits.
Fifth Revision	August 21, 2020	Added procedures for tracking and monitoring waterworks that temporarily stopped operation, operated at a reduced capacity, or closed.
Sixth Revision	July 16, 2021	The Declaration of Public Health Emergency related to the SARS-CoV-2 pandemic ended on June 30, 2021. Revisions address waterworks that reduced operations, temporarily suspended operations, or closed during the Public Health Emergency.

Drinking water is essential as the SARS-CoV-2 (coronavirus) pandemic continues. Public water systems (“waterworks”) have a heightened responsibility to protect public health and help prevent the spread of COVID-19, the disease caused by the SARS-CoV-2 virus. To this end, people need drinking water for life and other critical needs, such as handwashing during the coronavirus pandemic. ODW’s Program Guidance addresses how the office will work with waterworks whose operations have been impacted during the pandemic to ensure the safety and reliability of the state’s drinking water supplies.

During the Declaration of Public Health Emergency that existed in Virginia from March 12, 2020 to June 30, 2021, many waterworks owners and operators successfully continued normal operation and maintenance to ensure required sampling and safety of drinking water supplies. However, some waterworks reduced operations, temporarily suspended operations, or closed. Waterworks that closed may not have an operation permit at present. Now that the declared state of emergency has ended, the Program Guidance addresses start-up and permitting

requirements for waterworks that reduced or temporarily suspended operations, closed, and seasonal waterworks that did not open due to impacts from the pandemic.

ODW will continue to follow the Department of Labor and Industry (DOLI) [Permanent Standard for Infectious Disease Prevention of the SARS-CoV-2 Virus That Causes COVID-19, 16VAC25-220](#) (effective January 27, 2021) as long as it remains in effect. ODW will also continue to evaluate exposure risk and the status of COVID-19 spread in communities and waterworks to make case-by-case determinations about performing fieldwork, including the onsite portion of a sanitary survey. When a routine, in-person inspection or sanitary survey is not possible because of a COVID-19 outbreak or risk at a specific waterworks, then ODW staff will provide technical assistance to the extent possible over the phone, teleconferencing, videoconferencing and other remote methods of communication. Only in rare and emergency situations will staff provide on-site, in-person assistance at a facility with a COVID-19 outbreak.

Waterworks That Suspended Operation or Reduced Operation to Temporarily Serve a Population Less Than 25 Persons

- Nontransient noncommunity (NTNC) waterworks (e.g., one serving a school, child care facility, or factory) and transient noncommunity (TNC) waterworks that staff inactivated¹ in SDWIS must notify the field office prior to resuming operation as a “waterworks.” Field office staff will make a case-by-case determination about required testing and may require the waterworks to perform start-up procedures to ensure the water meets drinking water quality standards prior to returning it to an active status in SDWIS.

Reduced Operation, Temporary Closure, and Seasonal Waterworks

- Waterworks that closed temporarily (generally more than 30 days) due to the coronavirus or remained operational with limited or no water demand, but are returning to more normalized flow, should flush their plumbing system before the waterworks resumes normalized flow. Additional guidance and resources are on the ODW website. Staff may recommend special bacteriological sampling to verify the water quality is adequate.
- If a waterworks serves a seasonal facility that is opening for the season, then staff must discuss sampling requirements of the seasonal start-up plan with the waterworks operator and owner.

Permanent Closures

- If a waterworks closed permanently (i.e., lasting or intended to last or remain unchanged indefinitely), the owner will need to submit a permit application and receive a temporary

¹ To “inactivate” a waterworks, means it remains in ODW’s SDWIS database, with the expectation that it will resume operation within 12 months. During the period in which the waterworks is inactive, the owner is not required to monitor water quality, submit monthly reports, or meet other regulatory requirements – much like a seasonal waterworks when it is closed.

or standard operation permit to resume operation. Unless there is an operational change, Part III of the Regulations, as amended, will not apply to previously permitted waterworks that closed permanently between March 12, 2020 and June 30, 2021.

Waterworks Resuming Operation That Lack an Operation Permit

- Field office staff will perform a site visit to provide technical assistance for resuming operations and to confirm information provided by the owner prior to issuing an operation permit.

SDWIS Coding

- When staff determined that a waterworks (1) closed temporarily; (2) the population served and/or days of operation were less than the regulatory threshold for defining a waterworks; or (3) a waterworks was operating at less than its normal capacity, because of the coronavirus pandemic, they added the “COVID” water system indicator in SDWIS with a value of “YES”, and a “Begin Date” marking the start of the closure or change in operational conditions.
- Effective July 16, 2021, ODW will not add any new “COVID” water system indicators in SDWIS.
- For any waterworks that staff confirmed was inactive, staff inactivated the system in SDWIS by changing the “Activity Status” to “INACTIVE” in addition to the use of the COVID indicator as described above. Staff used the date of the concurrence document as the activity date, and included a brief description of the reason for inactivation in the status reason box.
 - Upon the owner re-opening the waterworks and collecting startup samples, ODW expects regular monitoring to commence and for staff to annotate the re-open date as the End Date on the “COVID” indicator (changing the indicator to “NO”) and also as the activity date (changing the “Activity Status” to “ACTIVE”). Do not delete the COVID indicator.
 - If the waterworks was due for an inspection during the period of inactivity, staff will conduct an inspection at the earliest possible opportunity upon learning of the re-opening or resumption of normal operation that meets the definition of a waterworks.
 - For waterworks that would have been required to collect Lead and Copper or any other compliance samples, but were in an inactive status, ODW expects monitoring to commence at the next applicable monitoring period (for example for ultimate reduced monitoring June through September of 2021, for routine monitoring the next 6 month monitoring period).